



# St. John the Baptist Parish School Board

118 West 10<sup>th</sup> Street • P.O. Drawer AL • Reserve, Louisiana 70084  
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Patrick H. Sanders  
Board President

Kevin R. George  
Superintendent

Sherry DeFrancesch  
Board Vice-President

## VIA CERTIFIED MAIL

March 12, 2019

Dr. Jimmy Guidry  
Louisiana Department of Health  
P.O. Box 629  
Baton Rouge, LA 70821-0629

Louisiana Dept. of Health

APR 01 2019

RE: DENKA/DUPONT Laplace, Louisiana

Office of the Secretary

Dear Dr. Guidry:

I am sending this correspondence on behalf of the entire St. John the Baptist Parish School Board, which has followed the press releases and studies released by your office, as well as statements made by the Louisiana Department of Environmental Quality, Denka/Dupont, Concerned Citizens of St. John and the Environmental Protection Agency, concerning chloroprene emissions and the health consequences thereof. Two facts are undeniable. First, the Environmental Protection Agency has identified chloroprene as a likely carcinogen for humans, and secondly, the Environmental Protection Agency has determined that the "safe" concentration for chloroprene in ambient air is 0.2 micrograms per cubic meter.

In your deposition that was taken on January 8, 2019, you made certain facts abundantly clear:

- (1) That the EPA has determined that the only acceptable level of risk for chloroprene emissions is at or below 0.2 micrograms per cubic meter;
- (2) That a three-month review of emissions data from March to May 2018 is a short period of time to make any analysis;
- (3) That you and your experts are continuing to study and review the chloroprene emissions data over a much longer period of time;
- (4) That when you were shown the latest emissions data, it indicated that on several days, the children at the 5th Ward Elementary School were exposed to emissions that exceeded the EPA's safe level of 0.2 micrograms per cubic meter. You stated that you had not seen these new numbers that show a recent upward trend in the emission levels at the 5th Ward Elementary School as well as at other locations, and that you were therefore not aware of those numbers. You indicated that you would like to have your experts look into this. We request that you and your experts look into those recent emission numbers and advise us of your findings as soon as you are able.
- (5) That until any reliable studies or conclusions are made and presented to you that change the EPA's conclusion, then 0.2 micrograms per cubic meter is the goal that you and the LDH will work to achieve for the safety and health of the school children and other residents of St. John the Baptist Parish; and

## MEMBERS OF THE ST. JOHN THE BAPTIST PARISH SCHOOL BOARD

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- 6) That you and LDH "... want to **err on the side of caution in children...** so that you can make sure you're protecting the kids' health... the childrens' health."

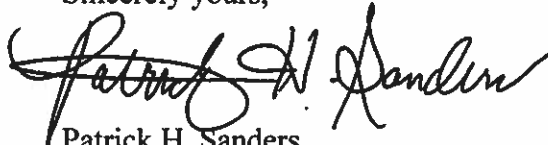
In 2016, the EPA made public its conclusion that at or below 0.2 micrograms per cubic meter is the upper limit of acceptable levels of chloroprene emissions. Since then, almost three years have passed. To date, that acceptable level of chloroprene emissions has not been achieved. This means that for the last three years the children and other residents of St. John the Baptist Parish have been forced to breathe the chloroprene emissions that exceed the EPA's acceptable level.

Consistent with the above facts, we, the St. John the Baptist Parish School Board request that you reiterate to Denka/Dupont that the most effective means of reducing the increased risk of cancer associated with exposure to chloroprene is to reduce chloroprene concentrations in ambient air to well below 0.2 micrograms per cubic meter and as close to 0.002 micrograms per cubic meter as is technologically achievable. We ask that you and the LDH do whatever you are authorized to do to cause Denka/Dupont to comply by bringing the chloroprene emissions level to at or below 0.2 micrograms per cubic meter.

You also relied on the data that the LTR has provided you and your experts. We request that you and the LDH investigate the LTR to determine the accuracy of the data you have heretofore obtained from them and ensure that you have received accurate and complete information from the LTR. We request that once your investigation is complete, you report back to the St. John The Baptist Parish School Board your findings in this regard.

We are hopeful that by working with your office, the Louisiana Department of Environmental Quality and Denka/Dupont, Denka will achieve this goal and in fact reduce the chloroprene emissions level to the EPA's upper level of acceptability, which is at or below 0.2 micrograms per cubic meter. This will reduce the risk of illness to everyone who lives, works and/or learns in St. John the Baptist Parish.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Patrick H. Sanders". The signature is fluid and cursive, with the first name "Patrick" and last name "Sanders" clearly distinguishable.

Patrick H. Sanders

President, St. John the Baptist Parish School Board

**St. John the Baptist Parish School Board**  
**P.O. Drawer AL**  
**Reserve, Louisiana 70084**

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Louisiana Dept. of Health

APR 01 2019

Office of the Secretary



**Dr. Jimmy Guidry**

**Louisiana Department of Health**

**P.O. Box 629**

**Baton Rouge, LA 70821-0629**

70821-0629

**Exhibit LDH-E Page 3 of 5**

## WHAT DID SEET DO ABOUT MONITORING DATA ABOUT THE CHLOROPRENE PLANT

4/1/2019

In RED the statement from the 4/1/2019 letter to Dr. Guidry, Louisiana State Health Officer and in black some information describing the actions taken by the Section of Environmental Epidemiology and Toxicology (SEET) of the Office of Public Health.

1-That the EPA has determined that the only acceptable level of risk for chloroprene emissions is at or below 0.2 micrograms per cubic meter;

What is the last EPA enforceable risk level?

2-That a three-month review of emissions data from March to May 2018 is a short period of time to make any analysis

Data have been reviewed regularly up to March 2019.

Year	Number of data point per site	Total
2016	70	420
2017	121 / 122	731
2018	120 / 121	724
2019	22	132

3-That you and your experts are continuing to study and review the chloroprene emissions data over a much longer period of time;

Done regularly

4.1-That when you were shown the latest emissions data, it indicated that on several days, the children at the 5th Ward Elementary School were exposed to emissions that exceeded the EPA's safe level of 0.2 micrograms per cubic meter

-None of the schools in the area meet the 0.2 $\mu$ /m<sup>3</sup>. If the 5<sup>th</sup> ward elementary should be closed ALL schools in the area should be closed.

4.2-You stated that you had not seen these new numbers that show a recent upward trend in the emission levels at the 5th Ward Elementary School as well as at other locations, and that you were therefore not aware of those numbers. You indicated that you would like to have your experts look into this. We request that you and your experts look into those recent emission numbers and advise us of your findings as soon as you are able.

-There is NO upward trend, in fact the trend is downward as show in the table below and the attached file. Note that these levels are calculated usin “None detect” as zero. See the attached Excel file for more details.

AVERAGE CONCENTRATION				
	2016	2017	2018	2019
Chad	10.2	7.0	3.1	4.3
Acorn	7.5	1.6	1.6	0.2
ESJ	2.2	1.5	0.7	0.5
5th	8.6	6.1	2.6	1.5
Levee	10.0	3.2	3.1	0.8
Ochsner	5.2	2.7	1.4	0.3
All	7.3	3.7	2.1	1.3

5-That until any reliable studies or conclusions are made and presented to you that change the EPA's conclusion, then 0.2 micrograms per cubic meter is the goal that you and the LDH will work to achieve for the safety and health of the school children and other residents of St. John the Baptist Parish.

LDEQ is working on decreasing the exposure. The overall exposure for all the sites combined went from 7.3 in 2016 to 1.3 in 2019.

6-You also relied on the data that the LTR has provided you and your experts. We request that you and the LOH investigate the LTR to determine the accuracy of the data you have heretofore obtained from them and ensure that you have received accurate and complete information from the LTR. We request that once your investigation is complete, you report back to the St. John The Baptist Parish School Board your findings in this regard.

SEET has evaluated the data on cancer in the area. We are going to compile everything we have in a comprehensive report in a few days.